

CES Environmental Services, Inc. (As of April 2, 2015)

The EPA mobilized to the Site on September 3, 2014 and began addressing the wastes and spills located on site.

As of April 2, the EPA Team has addressed the following:

Vacuum Boxes (original): Wastes contained in the original 11 vacuum boxes have been transferred into shippable vacuum boxes and off-site for disposal (Trustee addressed 1 of these vacuum boxes). All original vacuum box containers have been removed from the site (Trustee approved their contractor, C4 Environmental, to obtain these boxes for the price of cleaning the boxes and providing them with cleaning certificates)

Roll-Off Boxes (original): Wastes contained in the original 2 roll-off boxes have been disposed (Trustee addressed 1 roll-off box). All original roll-off boxes have been removed from the site (Trustee approved their contractor, C4 Environmental, to obtain these boxes for the price of cleaning the boxes and providing them with cleaning certificates)

Frac Tanks (original): Waste removed from 9 of 12 frac tanks (3 of 12 were originally empty). Four (4) of the emptied frac tanks that were originally rented by CES Environmental Services during their operations were released back to those rental companies (1 to Dynamic Rental Systems, 4 to Dana Transport). The EPA has notified Dana Transport that 3 additional frac tanks are ready for pickup. At this time, the remaining frac tanks that remain on-site for anticipated cleanup operation waste storage (4 CES, 3 Dana Transport).

Aboveground Storage Tanks (ASTs): Liquids and sludge have been removed from 19 of 20 Steel ASTs. One (1) Steel AST (ST1) and two (2) Poly Tanks (PT2,PT3) remain to be addressed. The last Steel AST contains an oily acid liquid/sludge and is in the process of being emptied. Liquids have been removed into Totes the sludge will have to be placed into drums (labor intensive operation). The two (2) Poly Tanks will be addressed along with similar waste streams located within drums/totes/miscellaneous containers.

Waste Water Treatment Tanks (WWTT): Liquids and sludge have been removed from 19 of 20 WWTTs. The remaining tanks consist of one tank containing lime slurry. The lime tank will be removed either into vacuum box or roll-off box. Prior to beginning Waste Water Tank removal, the secondary containment required liquid and solid removal. The secondary containment is substantially complete but additional and periodic cleaning will be necessary due to rainfall into the building as well as drips/leaks from cleanup operations.

Totes/Drums/Vats/Misc Containers: Empty containers have been segregated for cleaning (pressure washing). Full/Partially Full containers have been sampled, field characterized and currently being segregated into appropriate waste streams to be bulked, sampled, and properly containerized for disposal. There are approximately 8 poly tanks, 2 Vats, and 150 totes/drums with materials to be addressed. Additionally, there are approximately 166 RCRA empty totes/drums to be addressed. XXXXX

Removal of Contaminated Sediments/Solids: General cleaning of visibly contaminated areas causing sheens on storm water has been completed. The cleaning of stained areas will continue to the extent possible but is not a high priority unless it is or possibly could cause a sheen on the storm water. Silt barriers and oil absorbent boom are in place to reduce sediment and hydrocarbon releases to storm water drains during a rain event.

Loading Bays (Main Warehouse): The bays have been substantially cleared of debris and chemical wastes to the extent possible although the trenches will have to be addressed.

Truck Cleaning Bay: The bays have been cleaned and sludge substantially removed from trenches leading to sump. The sump and trenches remain to be addressed. This area will be used for container cleaning activities, as necessary.

Storm Water Management: This activity continues as rainfall occurs. Storm water is being allowed to drain from the site through silt barriers and absorbent boom. The southern portion of the facility currently remains diked which disrupts cleanup operations after a rain event. The site is usually inundated with storm water during a rain event. A one inch rainfall adds approximately 180,000 gallons of water on the facility where approximately 60,000 gallons drains to the northern portion of the facility and 120,000 drains to the southern portion of the facility where it is currently diked. Eventually, the diked area will be opened up to allow normal storm water runoff to occur albeit through silt barriers and absorbent boom. The City of Houston has assisted EPA in allowing it to discharge the original accumulated and contaminated storm water into the City of Houston sanitary sewer and this option currently remains an option for questionable storm water issues should the need arise.

Waste Piles (Southern Portion of Facility): Trustee removed wastes dumped to the ground in March 2014 due to the theft of 7 roll-off boxes. An additional debris pile exists that is associated with the construction of the berm around the southern portion of the facility.

Lab Chemicals/Company Profile Samples: Trustee consolidated and disposed;

Bulk Process Chemicals: Trustee collected and disposed;

Items that Remain to be completed:

1. Wastewater Treatment Tank Area
 - Sludge Removal: LIME
 - Residual Sludge Removal: PT5
 - Piping: Remove Materials
 - Secondary Containment: Final Cleanup
2. Aboveground Storage Tank Area
 - Liquid/Sludge Removal: ST1
 - Liquid Removal: PT2, PT3
 - Piping: Remove Materials
 - Secondary Containment: Remove contaminated Sand and Final Cleanup
3. Frac Tank Waste Disposal
 - Frac Tanks: FT1001, FT5180
 - Frac Tank (Off-Site Cleaning/Deodorizing): FT1004
 - Contact Dana Transport: Pick Up and Clean Three (3) Frac Tanks
4. Bulk Poly Tanks, Totes, Vats, Drums, Misc Containers, Carbon, Supersacks and clean/cut up
Empties (2 Poly Tanks w/contents, 1 Poly Tank w/residuals, 40 totes w/residuals, 50 steel drums
w/ residual, 14 steel drums w/contents, 40 poly drums w/residuals)

5. Remove Material (Liquids/Solids) form Large VAT South of ASTs
6. Place large pipe with valve out the South Pond Area for Storm Water Drainage;
7. Main Warehouse
Chop Saw Piping in Trench and Remove Trench Solids
Clean Contaminated Solids from Warehouse Floor
8. Truck Wash Bay, Shed, Former Shed:
Truck Wash Bay: Remove Liquids/Solids and from Sump and Trenches and Final Clean
Shed: Remove Liquids/Solids from Sump and Drains and Final Clean
Former Shed: Remove Liquids/Solids from Sumps and Trenches and Final Clean
9. Dispose of Containerized Wastes (vac boxes, fracs tanks, roll-offs, drums/totes)

Roll-off Boxes:

Number	Status
OT 25563	Sand/Trench Residue
OT 25480	Cut up Totes and Drums
OT 25319	Debris (ADS Hose, Wood,Pails, Plastic, PPE)
OT 25134	Debris (Pails, PPE, Wood)
OT 25337	Debris (ADS Hose, Wood,Pails, Plastic)

Vacuum Boxes:

Number	Status
VB 25242	Empty Cleaned Deodorized by Veolia
VBDW 25196	N OT 8
VB 25302	Sludge N T 3, N T 5, N T 6, S T 8 N OT 8
VB 2501	ST 6
VB 25206	FT1004 Oily Material
VB 25274	FT 1004 Oily Material
VB 25229	FT 1004 Sludge
VB 2564	T-108
VB 25203	T1, T 11, T 3
VBDW 25315	T-7, T-8, T11, T 10, T 9, T 4
VB 25146	FT 1001, FT 215012, WMU 123
VBDW 25147	Sludge from Group 24, 25, 26, and 27

Frac Tanks:

Number	Status
FT 1001	Full
FT 5180	Active 5%
FT 1004	Empty (Send off for Cleaning/Deodorizing)
FT 1002	Empty - Rinsed
FT 215012	Empty-Rinsed
FT 30335	Empty-Rinsed
FT 33527	Empty-Rinsed

Bulked Containers: Materials Repackaged

Description	Number of Containers
Acid Containers	21 Totes, 12 Drums
Base Containers	5 Totes, 1 Drum

EPA Removal Costs (Estimated as of 3/31/15): \$ 1,462,553